

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

Cathy D. Brooks-McCollum
& On behalf of
Emerald Ridge Service Corporation Derivative Action
As a Director
PO Box 12166
Wilmington, DE 19850
(302) 21-1241
(PLAINTIFF)

CIVIL ACTION NO: 04-419(JJF)

JURY TRIAL REQUESTED



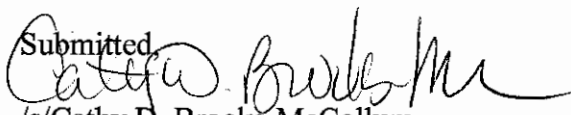
vs.

State Farm Insurance Company
(Defendants)

SECOND REQUEST TO PRODUCE DOCUMENTS AND THINGS

Plaintiff hereby request that State Farm through its' attorneys produce the Transcript taken between Casarino & Plaintiff Cathy Brooks-McCollum. Plaintiff further request that Defendants produce all State Farm Insurance Policies regarding Plaintiff Emerald Ridge Service Corporation. Plaintiff further requests that State Farm produce all documents sent to Plaintiff regarding their position on not insuring Emerald Ridge Service Corporation & Plaintiff. Plaintiff further request that State Farm produce all documents concerning and relating to Emerald Ridge Service Corporation during said time surrounding these proceedings, including but not limited to documents presented and by whom for coverage pursuant the Emerald Ridge Service Corporation Policy.

***DUCES TECUM**

Submitted

/s/Cathy D. Brooks-McCollum
PO Box 12166
Wilmington, DE 19850
(302) 521-1241

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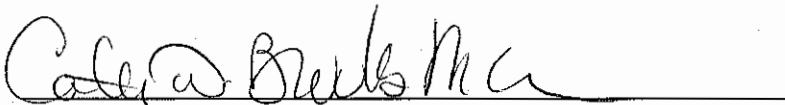
vs.

State Farm Insurance Company
(Defendants)

PROOF OF SERVICE

I Cathy D. Brooks-McCollum hereby certify that on the 23rd day of August 2007, I will have caused to be served a true and correct copy of the foregoing two Motions electronically upon defendants:

Casarino, Christman & Shalk
Stephen P. Casarino
800 North King Street
Suite 200
PO Box 1276
Wilmington, DE 19899
(302) 594-4500 (Telephone)
(302) 594-4509 (Fax)



/s/ Cathy D. Brooks-McCollum (Pro SE)
PO Box 12166
Wilmington, DE 19850
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